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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

Della Kamkoff, John Andrew, Kayla Birch,
Rose Carney, Tereresa Ferguson, Zoya
Jenkins, Troy Fender, Rhonda Conover,
Autumn Ellanna, and Nataliia Moroz, on
behalf of themselves, and all those similarly
situated,

Plaintiffs,

v.

Heidi Hedberg, in her official capacity as
Commissioner of the Alaska Department of
Health.

Defendant.

Case No. 3:23-cv-00044-SLG

**PLAINTIFFS' RENEWED
MOTION FOR
PRELIMINARY
INJUNCTION**

Pursuant to Fed. R. Civ. P. 65, plaintiffs Della Kamkoff, John Andrew, Kayla Birch, Rose Carney, Tereresa Ferguson, Zoya Jenkins, Troy Fender, Rhonda Conover, Autumn Ellanna, and Nataliia Moroz, by and through counsel, the Northern Justice Project, LLC, the National Center for Law and Economic Justice, and DLA Piper hereby make a motion before this Court for an order preliminarily enjoining Defendant from violating the Federal SNAP Act, 7 U.S.C. §§ 2011, 2014 and 2020, and implementing regulations, for the reasons set forth in the memorandum of law attached hereto.

Specifically, the Plaintiffs seek a preliminary injunction enjoining the Defendant to:

1. Promptly process SNAP applications and recertifications as is required by 7 U.S.C. § 2020(e)(3), (4), and (9), including those cases now eligible for expedited processing, now pending beyond legally mandated-processing timeframes during the pendency of the litigation, and on an ongoing basis;
2. Provide written notice and opportunity to request a fair hearing to those SNAP applicants whose applications are not processed within the mandated timeframes; and
3. Provide a mechanism for informal relief to class members awaiting application or recertification processing beyond the mandated timeframes.

This motion is supported by the Declaration of Nicholas Feronti in Support of Plaintiffs' Renewed Motion for Preliminary Injunction, and exhibits attached thereto; Declarations of Rose Carney, Zoya Jenkins, Steve Younker, Rachel Grant and Roger

Gaston; and a Memorandum of Law in Support of Plaintiffs' Renewed Motion for Preliminary Injunction; and is filed with a Proposed Order.

DATED this 8th day of May, 2024 at Anchorage, Alaska.

Attorneys for Plaintiffs

/s/ Nicholas Feronti

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**appearing pro hac vice*

Attorneys for Plaintiffs

Certificate of Service

I hereby certify that on May 8, 2024, true and correct copies of the Plaintiffs' Renewed Motion for Preliminary Injunction; Declaration of Attorney Nicholas Feronti in Support of Plaintiffs' Renewed Motion for Preliminary Injunction; Declaration of Zoya Jenkins; Declaration of Rose Carney; Declaration of Steve Younker; Declaration of Rachel Grant; Declaration of Roger Gaston; Memorandum of Law in Support of Plaintiffs' Renewed Motion for Preliminary Injunction, and a proposed order were served on all parties via the CM/ECF electronic filing system.

/s/ Nicholas Feronti

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